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Counsel for Plaintiffs

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

CALIFORNIA TRIBAL FAMILIES COALITION,
 YUOK TRIBE, CHEROKEE NATION, FACING
 FOSTER CARE IN ALASKA, ARK OF
 FREEDOM ALLIANCE, RUTH ELLIS CENTER,
 and TRUE COLORS, INC.,

Plaintiffs,

v.

ALEX AZAR, in his official capacity as Secretary of
 Health and Human Services, LYNN A. JOHNSON,
 in her official capacity as Assistant Secretary for the
 Administration for Children and Families, U.S.
 DEPARTMENT OF HEALTH AND HUMAN
 SERVICES, and ADMINISTRATION FOR
 CHILDREN AND FAMILIES,

Defendants.

Case No. 3:20-cv-6018-MMC

**JOINT STIPULATED REQUEST RE:
 BRIEFING SCHEDULE**

Pursuant to this Court's Standing Order (ECF No. 38-1) and Local Civil Rules 6-2 and 7-12, the Parties hereby stipulate to and respectfully request entry of a Court order enlarging the time for summary judgment briefing consistent with the following schedule:

- October 15: Defendants' combined response to Plaintiffs' motion for summary judgment and cross-motion for voluntary remand
- November 5: Plaintiffs' combined reply in support of their motion and response to Defendants' cross-motion
- November 19: Defendants' reply in support of their cross-motion
- December 3, or the next available date: Hearing on the cross-motions

Defendants maintain their request for a stay of summary judgment briefing, which Plaintiffs continue to oppose. *See* Doc. No. 96 (Sept. 3, 2021). If the Court grants that request, Defendants shall file their motion for voluntary remand on October 15, 2021.

This enlargement was agreed upon through mediation with Magistrate Judge Beeler to allow Defendants time to provide a settlement proposal to Plaintiffs. Defendants will make best efforts to provide a settlement proposal by September 30, 2021, addressing the questions posed by Plaintiffs during mediation. If Defendants are not able to do so, they will provide a date certain on September 30 for providing such a proposal. The parties agree that no further extensions of Defendants' next filing deadline will be sought except pursuant to joint agreement by the parties or in exigent circumstances.

IT IS SO STIPULATED.

Dated: September 15, 2021

Respectfully submitted,

By: /s/ Jeffrey B. Dubner
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Dated: September 15, 2021

Respectfully submitted,
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United States Attorney

/s/ Emmet P. Ong
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Assistant United States Attorney

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Counsel for Defendants

[PROPOSED] ORDER

Pursuant to stipulation of the parties, IT IS SO ORDERED.

DATED: _____

HON. MAXINE M. CHESNEY
United States District Judge